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17 Attorneys for Plaintiffs
 CORY SPENCER, DIANA MILENA
 18 REED, and COASTAL PROTECTION
 RANGERS, INC.
 19

20 **UNITED STATES DISTRICT COURT**
 21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
 22

23 CORY SPENCER, an individual;
 24 DIANA MILENA REED, an
 individual; and COASTAL
 25 PROTECTION RANGERS, INC., a
 26 California non-profit public benefit
 corporation,
 27
 28 Plaintiffs,

CASE NO. 2:16-cv-02129-SJO (RAOx)
**PLAINTIFFS' NOTICE OF MOTION
 TO COMPEL DEFENDANT CHIEF
 KEPLEY TO PRODUCE
 DOCUMENTS**

[Filed Concurrently with: [Proposed Joint
 Statement Re Plaintiffs motion to Comprl
 Production of Documents; Declaration of
 Victor Otten]

1
2 v.

3 LUNADA BAY BOYS; THE
4 INDIVIDUAL MEMBERS OF THE
5 LUNADA BAY BOYS, including but
6 not limited to SANG LEE, BRANT
7 BLAKEMAN, ALAN JOHNSTON
8 AKA JALIAN JOHNSTON,
9 MICHAEL RAE PAPAYANS,
10 ANGELO FERRARA, FRANK
11 FERRARA, CHARLIE FERRARA,
12 and N. F.; CITY OF PALOS VERDES
13 ESTATES; CHIEF OF POLICE JEFF
14 KEPLEY, in his representative
15 capacity; and DOES 1-10,

16 Defendants.

Judge: Hon. Rozella A. Oliver
Date: September 6, 2017
Time: 10:00 am
Crtrm.: F, 9th Floor____

Complaint Filed: March 29, 2016
Trial Date: November 7, 2017

17 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

18 PLEASE TAKE NOTICE that on at 10:00 a.m., in the courtroom of the
19 Honorable Rozella A. Oliver, located at 312 North Spring Street, Los Angeles,
20 California, 90012, in Courtroom F, 9th floor, Plaintiff will and hereby does move
21 pursuant to Fed. R. Civ. P. 37(a) for an order compelling Defendant Chief Kepley to
22 be ordered to produce all the documents that have not been turned over, and a ruling
23 that any objections and/or privileges are not proper. Plaintiffs further request that
24 this Court order Defendant and his attorney to pay Plaintiffs' counsel's fees and costs
25 incurred because of his refusal to respond to Plaintiffs' document requests. There is
26 no justification for his failure to produce any documents in response to Plaintiffs'
27 requests. Accordingly, Plaintiffs are entitled to recover their reasonable expenses.
28 Fed. R. Civ. P. 37(a)(5).

Prior to filing this Motion, the parties have met and conferred pursuant to L.
R. 37-1, and made a good faith attempt to resolve this dispute but were unable to do

1 so.

2 This Motion is being brought pursuant to the discussion between counsel and
3 Judge Oliver at the hearing held on July 26, 2017.

4 This Motion to Compel is based upon this Notice, the concurrently filed
5 Proposed Joint Stipulation Regarding Plaintiff's Motion to Compel documents, the
6 declaration of Victor Otten. The pleadings and records on file in this action and such
7 other matters as the Court deems necessary and proper.

8
9 DATED: August 7, 2017

OTTEN LAW PC

10 By: /s/ Victor Otten

11 VICTOR OTTEN

12 Attorneys for Plaintiffs
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